

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION V**

EPA Region 5 Records Ctr.



374737

**DATE:** July 24, 2003  
**FROM:** Michael Chrystof  
**TO:** Karen Mason-Smith, Ft. Dearborn RPM  
**SUBJECT:** US-EPA Response to Army Response to Comments on Draft Construction Completion Report for Various Site Remediations (dated April 2003), Ft. Dearborn, Chicago, Ill.

Please find attached US-EPA Response to Comments.

Attachment

**US-EPA RESPONSE TO ARMY RESPONSE TO COMMENTS ON DRAFT**

**CONSTRUCTION COMPLETION REPORT  
FOR VARIOUS SITE REMEDIATIONS  
FT. DEARBORN, IL**

**COMMENTS:**

1. **Section 3.1.5 Analytical Data Validation, p.15:** Text states that the independent third-party validation (to be done by USACE contractor Lee A. Knupple and Assoc.), on at least 10% of the data, was submitted separately from this document. US-EPA has not received this data validation report as yet. Please be advised that our review of this Construction Completion Report will not be complete without our ability to review the third-party data validation report, and findings. **ARMY Response:** Third party data validation report is pending and will be provided in a separate submission as soon as it is available. **US-EPA Response:** Understood. Please provide the report so that US-EPA may continue our review process.
2. **Tables Section/all SVOCs:** It was noted that for all the SVOC data tables, significant hits were listed for 2,4,6 Tribromophenol (listed as a surrogate in the SVOC analytical reports provided in Appendix D), but no listing or values for 2,4,6 Trichlorophenol (which was an actual analyte listed in the Appendix D SVOC reports). Is this a typo, or is the surrogate being reported out here? **ARMY Response:** The table has been corrected to replace 2,4,6 Tribromophenol with 2,4,6 Trichlorophenol. Also, several other errata corrections will be included. **US-EPA Response:** Understood. Please provide the revised Table(s) so that US-EPA may continue our review process.
3. **Appendix D, Case Narratives, Manual Integration:** It was noted for every case narrative, under PCB Fraction - Method 8082, there were listing of pages where manual integration took place, and the only explanation provided was a statement to "See hard copy for explanations of manual integrations". There were no hard copy provided, nor any explanations of why any of this manual integration took place in this report. Please provide an explanation of what manual integrations took place, why they were necessary, and if it was deemed justified. **ARMY Response:** ARDL followed Region V Manual Integration Policy which lists GC/MS methods. Since SW8082 is a GC method, documentation is not required, but can be obtained upon request. **US-EPA Response:** Understood. Although the Region V manual integration policy lists GC/MS methods; both logic and the desire for meaningful project data would encourage data reviewers/validators to be vigilant to ensure the proper use of manual integration at any time or for any method in which it is being utilized. Please provide the documentation (in Appendix D as mentioned), and include feedback as to the reasons for, necessity of, and proper performance of manual integrations for all methodologies for which it is performed.
4. **Appendix D, Lab Report 301101:** The sample VWR-008-02-EBT appears on the chain of custody forms, and has analytical data output forms for VOCs, SVOCs, PCBs, PAHs, Glycol, and Inorganics. However, there is no listing of this data in the Tables section of

this report, nor a mention in either the text of the report, or indication on the sampling Figure 4 (Former Vehicle Wash Rack) area, as to where this sample was taken or what impact (if any) this data had. Please explain. **ARMY Response:** Sample is a field duplicate of sample VWR-006-02-EBT. Results have no impact upon the findings presented in the Construction Completion Report. **US-EPA Response: Understood.**

5. **Appendix D, Lab Report 301104:** The sample OWS-005-08-EBT appears to have been run three times for VOCs (there are three separate VOC data sheets, numbered ARDL lab no.301104-01, 301104-01MS, and 301104-MD). The Tables section of the report, shows only the data for one of the samples, not the MS/MD pair. Are the hits for 1,1 dichloroethene, benzene, trichloroethene, toluene, and chlorobenzene shown in the MS and MD samples due only to the matrix spike? **ARMY Response:** The detections of these compounds in the MS and MSD samples were due to the spike. **US-EPA Response: Understood.**
6. **Appendix E, Data Validation Report:** In Section 2.13 Manual Integration, text states that the laboratory case narratives did not provide any documentation of manual integration for GC or GC/MS analysis. The raw data for only two SDGs were reviewed for evidence of manual integration. There is little or no indication from this Validation Report of why the manual integrations were done, if the manual integrations were done properly, or if they were even necessary. Furthermore, this level of review does not satisfy the requirements of the Region V Manual Integration Policy, as the text infers in the Summary Section 3.0 of this Data Validation Report. The validation did not even satisfy the requirements of the Final Project QAPP (see Final Project QAPP, , June 2002, Section 6.2.5 Manual Integration, p.32 -34). All manually integrated data (100%) must be validated by an independent third party validator. US-EPA has not yet seen the third party validation report, nor any indication that 100% of the manually integrated data has, or ever will be, validated. **ARMY Response:** The text in Section 2.13 was incorrect. The case narratives included in Appendix D list all instances of manual integration. Section 2.13 will be revised, and the third-party data validation report will be submitted. **US-EPA Response: Understood. Please provide the revisions and the third party data validation report so that US-EPA may continue our review process.**